



February 12, 2025

Chief Shon F. Barnes  
Seattle Police Department  
PO Box 34986  
Seattle, WA 98124-4986

Dear Chief Barnes:

Please see the below Management Action Recommendation.

**Case Number**

- 2024OPA-0263 / 2025COMP-0006

**Topic**

- Parking Enforcement Manual - Publication

**Summary**

- It was alleged that two parking enforcement officers (PEOs) used unreasonable discretion to unlawfully detain a community member against policy and training.

**Analysis**

- After a community member drove aggressively, two PEOs positioned their vehicles in front of and behind the community member's vehicle. One PEO instructed the community member to turn off her vehicle and wait for police. OPA determined the community member was not told she was free to leave.
- The PEO's use of flashing lights, uniforms, and marked vehicles could lead a community member to believe they were being detained.
- OPA determined that PEOs are instructed that "PEOs are not Police Officers and cannot detain anyone."
- On the date of this incident, SPD's Parking Enforcement Unit did not have a unit manual.
- The Parking Enforcement Unit has since created a unit manual, but it is "dynamic" in nature. As of OPA's receipt date (12/12/2024) the manual did not include any material prohibiting the detention of drivers.<sup>1</sup>
- The absence of a published manual creates challenges for holding PEOs accountable to clearly articulated standards, although these are covered in training.
- OPA reviewed comparable cities to understand their policies around parking enforcement officer responsibilities.
  - San Diego's parking enforcement is within the Police Department, which publishes a separate parking enforcement manual that requires parking enforcement to notify dispatch of a dangerous driver.<sup>2</sup>

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<sup>1</sup> Seattle Police Department. Parking Enforcement Unit Manual. Retrieved: 12/12/2024.

<sup>2</sup> San Diego Police Department. Parking Enforcement Unit. [Operations Manual](#). May 2024.



- Portland's parking enforcement and operations officers "provide assistance as a special police officer" but per city code cannot detain drivers.<sup>3</sup>

**Recommendations**

- SPD should publish their parking enforcement manual and make it available to the public, as well as PEOs for training and guidance. Any updated and prior versions of the manual should be recorded so PEOs understand their expectations and responsibilities.
- The Parking Enforcement Unit Manual should explicitly prohibit PEOs from making traffic stops or detaining drivers. PEOs should be trained on what behaviors might legally rise to a stop or detention and have an accessible and published manual to refer to for guidance.<sup>4</sup>

I appreciate your consideration and look forward to your response.

Sincerely,

A handwritten signature in black ink, appearing to read "Bonnie Glenn".

Bonnie Glenn  
Interim Director, Office of Police Accountability

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<sup>3</sup> Portland City Code Section, [16.10.650, Parking Enforcement Officers](#). Effective 01/02/2009.

<sup>4</sup> Parking Enforcement Unit Manual – secured SharePoint drive.